

UNITED STATES DISTRICT COURT
FOR THE WESTERN DIVISION OF TEXAS
EL PASO DIVISION

LULAC, et al.,

Plaintiffs,

vs.

GREG ABBOTT, in his
official capacity as
Governor of Texas, et al.,

Defendants,

ROY CHARLES BROOKS,
et al.,

Plaintiffs,

vs.

GREG ABBOTT, in his
official capacity as
Governor of Texas, et al.,

Defendants.

Case No.: 3:21-CV-00259-
DCG-JES-JVB [Lead Case]

Case No.: 1-21-CV-00991-
DCG-JES-JVB
[Consolidated Case]

ORAL DEPOSITION OF

SENATOR JOAN HUFFMAN

January 21, 2022

<p style="text-align: right;">Page 2</p> <p>1 ORAL DEPOSITION OF SENATOR JOAN HUFFMAN, produced as</p> <p>2 a witness at the instance of the Plaintiffs and duly</p> <p>3 sworn, was taken in the above-styled and numbered cause</p> <p>4 on January 21, 2022, from 9:06 a.m. to 9:46 a.m., before</p> <p>5 Amy M. Clark, Certified Shorthand Reporter in and for</p> <p>6 the State of Texas, reported by computerized stenotype</p> <p>7 machine at the offices of Brazil & Dunn, 4401 Bee Caves</p> <p>8 Road, Building 1, Suite 111, Austin, Texas 78746,</p> <p>9 pursuant to the Federal Rules of Civil Procedure and the</p> <p>10 provisions stated on the record or attached hereto.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES</p> <p>2</p> <p>3 FOR PLAINTIFFS:</p> <p>4 Mr. Chad W. Dunn</p> <p>5 Brazil & Dunn LLP</p> <p>6 4407 Bee Caves Road</p> <p>7 Building 1, Suite 111</p> <p>8 Austin, TX 78746</p> <p>9 Telephone: (512) 717-9822</p> <p>10 Fax: (512) 515-9355</p> <p>11 Email: chad@brazilanddunn.com</p> <p>12 AND</p> <p>13 Mr. Mark Gaber</p> <p>14 Mark P. Gaber, PLLC</p> <p>15 PO Box 34481</p> <p>16 Washington, D.C. 20043</p> <p>17 Phone: (715)482-4066</p> <p>18 Email: mark@markgaber.com</p> <p>19</p> <p>20 FOR DEFENDANTS:</p> <p>21</p> <p>22 Mr. Christopher D. Hilton</p> <p>23 Mr. Patrick K. Sweeten</p> <p>24 Office of the Texas Attorney General</p> <p>25 300 West 15th Street</p> <p>Austin, Texas 78701</p> <p>Telephone: (512) 463-2120</p> <p>Email: christopher.hilton@oag.texas.gov</p> <p>Email: patrick.sweeten@oag.texas.gov</p> <p>FOR NAACP OF TEXAS:</p> <p>Mr. Robert Notzon via Zoom videoconference</p> <p>The Law Office of Robert Notzon</p> <p>1502 West Avenue</p> <p>Austin, Texas 78701</p> <p>Telephone: (512)474-7563</p> <p>Email: robert@notzonlaw.com</p> <p>AND</p> <p>Ms. Pooja Chaudhuri via Zoom videoconference</p> <p>Lawyer's Committee for Civil Rights Under Law</p> <p>1500 K Street NW</p> <p>Suite 900</p> <p>Washington, DC 20005</p> <p>Phone: (202) 662-8319</p> <p>Email: pchaudhuri@lawyerscommittee.org</p>
<p style="text-align: right;">Page 4</p> <p>1 FOR FAIR MAPS PLAINTIFFS:</p> <p>2 Ms. Samantha Serna Uribe via Zoom videoconference</p> <p>3 Mr. Kenneth Parreno via Zoom videoconference</p> <p>4 Ms. Nina Perales via Zoom videoconference</p> <p>5 MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL</p> <p>6 FUND, INC.</p> <p>7 110 Broadway</p> <p>8 Suite 300</p> <p>9 San Antonio, TX 78205</p> <p>10 Phone: (210) 224-5476</p> <p>11 Fax: (210) 224-5382</p> <p>12 Email: nperales@maldef.org</p> <p>13 AND</p> <p>14 Ms. Ashley Harris via Zoom videoconference</p> <p>15 American Civil Liberties Union, Texas</p> <p>16 PO Box 8306</p> <p>17 Houston, Texas 77288</p> <p>18 Phone: (713)942-8146</p> <p>19 Email: aharris@aclutx.org</p> <p>20 AND</p> <p>21 Ms. Noor Taj via Zoom videoconference</p> <p>22 Southern Coalition for Social Justice</p> <p>23 1415 West Highway 54</p> <p>24 Suite 101</p> <p>25 Durham, NC 27707</p> <p>Phone: (919)323-3380 Ext. 126</p> <p>Email: noor@scsj.org</p> <p>FOR U.S. DEPARTMENT OF JUSTICE:</p> <p>Ms. Michelle Rupp via Zoom videoconference</p> <p>U.S. Department of Justice</p> <p>950 Pennsylvania Avenue, NW</p> <p>Washington, DC 20530-0001</p> <p>Phone: (202)305-0565</p> <p>Email: michelle.rupp@usdoj.gov</p> <p>ALSO PRESENT VIA ZOOM VIDEOCONFERENCE:</p> <p>Ms. Alexandra Wolfson,</p> <p>Southern Coalition for Social Justice, Fellow</p>	<p style="text-align: right;">Page 5</p> <p>1</p> <p>2 INDEX</p> <p>3</p> <p>4 PAGE</p> <p>5 Appearances3</p> <p>6 SENATOR JOAN HUFFMAN</p> <p>7 Examination by Mr. Dunn6</p> <p>8 Court Reporter's Certificate34</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>EXHIBITS</p> <p>(None offered)</p>

<p style="text-align: right;">Page 6</p> <p>1 SENATOR JOAN HUFFMAN, 2 having been first duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. DUNN 5 Q. Please tell us your name. 6 A. Joan Huffman. 7 Q. Senator Huffman, my name's Chad Dunn. I 8 represent the Brooks Plaintiffs in this lawsuit in 9 El Paso. 10 I assume you've been told a bit about our 11 case in El Paso; is that true? 12 A. Yes, sir. 13 Q. You're a lawyer, as I understand it? 14 A. Yes. 15 Q. Have you ever practiced law? 16 A. I was a prosecutor for many years in Harris 17 County, Texas. 18 Q. Have you ever handled civil matters? 19 A. No. 20 Q. Have you ever taken a deposition? 21 A. Yes. 22 Q. On how many occasions? 23 A. Not taken -- well, been a witness in a 24 deposition. I've never led a deposition. 25 Q. Okay.</p>	<p style="text-align: right;">Page 7</p> <p>1 A. To clarify, yes. 2 Q. Okay. So just to make sure it's clear, you've 3 never questioned a witness in a deposition? 4 A. Correct. 5 Q. Okay. But you have testified a few times? 6 A. Right. 7 Q. Or once? 8 A. Once or twice. 9 Q. Once. Okay. 10 A. I recall that. 11 Q. Well, I'd like to know a little bit about that. 12 I'll ask you about that in just a minute. But just -- 13 A. Okay. 14 Q. I can already tell one issue we're gonna have 15 is -- is we're talking over one another, which is making 16 it difficult for our court reporter. So I'll do better 17 at letting you answer the question. And if you could 18 try to help me by letting me finish the question before 19 you answer. Okay? 20 A. Yes. 21 Q. Obviously, as you know, they can only take down 22 words here. So I'm gonna ask you is that a yes or, you 23 know, is that a no. I'm not trying to be rude to you. 24 I'm just trying to make sure our transcript reflects 25 what you've said or what your -- what your testimony is.</p>
<p style="text-align: right;">Page 8</p> <p>1 Other than that, as you know, you're not 2 trapped in this chair, by any means. So if you need to 3 take a break, you let us know; happy to do that. We may 4 have a question or two we want to wrap up before we take 5 a break, but we'll always accommodate that. 6 And then, you know, you're the only person 7 that knows whether you understand the question. So if 8 you -- if you answer it and you don't tell me you didn't 9 understand it, we'll all assume you did. So I -- I can 10 assure you -- all I will almost certainly ask you a 11 question that you won't understand because it won't make 12 any sense. So just let me know that, and I'll do my 13 best to rephrase it so you can understand it. 14 And then, finally, you know, I don't plan 15 on this deposition being any more aggressive than our 16 conversation has been so far. We -- we -- this is our 17 one chance to talk to you before the hearing to find out 18 what your recollection is as to some various facts 19 and -- so that's all we -- that's all we ask to do 20 today. Okay? 21 A. Yes. 22 Q. I will say, though, as -- as friendly and 23 professional as I expect to be, you understand it is 24 critically important you tell us the truth today? 25 A. Of course.</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Yeah. Okay. 2 Well, I wanted to back up. You said 3 you've testified, you think, one or two times. 4 Can you recall what kind of matters those 5 were? 6 A. There was a -- a lawsuit many years ago when I 7 was a judge in Harris County, Texas, where a defendant 8 filed a federal lawsuit. I seem to recall that there 9 was a deposition in that. 10 Secondly, I was a party to a civil lawsuit 11 that my husband and I had filed. I was the -- testified 12 in a deposition in pursuit of that lawsuit. 13 Q. What was the general nature of the case? 14 A. Of which case? 15 Q. The lawsuit that you filed. 16 A. It had to do with faulty installation of music 17 and television speaker equipment in our home. 18 MR. HILTON: I'm sorry. Chad, just before 19 we get too far into it. 20 Could we have the folks watching on Zoom 21 announce? 22 MR. DUNN: Sure. Can you hear us there in 23 the Zoom? 24 MS. URIBE: Yes, we can. Thank you. 25 MR. DUNN: Then we'd -- we'd like to have</p>

<p style="text-align: right;">Page 10</p> <p>1 announcements of who is participating by Zoom, please.</p> <p>2 MS. URIBE: Sure. I'm Samantha Serna</p> <p>3 Uribe. I'm with MALDEF representing LULAC, et al. And</p> <p>4 joining me is Kenneth Parreno also with MALDEF.</p> <p>5 MR. DUNN: Anyone else?</p> <p>6 MS. TAJ: This is Noor Taj -- sorry. Go</p> <p>7 ahead.</p> <p>8 MR. NOTZON: Robert Notzon with the Texas</p> <p>9 NAACP.</p> <p>10 MS. TAJ: This is Noor Taj from SCSJ</p> <p>11 representing the Fair Maps Plaintiffs.</p> <p>12 MS. HARRIS: This is Ashley Harris from</p> <p>13 ACLU of Texas representing the Fair Maps Plaintiffs.</p> <p>14 MS. WOLFSON: This is Alexandra Wolfson</p> <p>15 from SCSJ representing the Fair Maps Plaintiffs.</p> <p>16 MS. ROOT: Michelle Rupp from the U.S.</p> <p>17 Department of Justice.</p> <p>18 MS. CHOWDHURY: Pooja Chaudhuri</p> <p>19 representing the Texas NAACP.</p> <p>20 MR. DUNN: Anyone else?</p> <p>21 Okay.</p> <p>22 MR. HILTON: Thanks, Chad.</p> <p>23 MR. DUNN: Okay.</p> <p>24 Q. (By Mr. Dunn) So let's sort of just kind of</p> <p>25 start with your political career.</p>	<p style="text-align: right;">Page 11</p> <p>1 You mentioned you were a judge.</p> <p>2 But just to get a sense of, you know,</p> <p>3 when -- when did you first start in public service?</p> <p>4 A. I became a prosecutor -- well, I started as a</p> <p>5 secretary at the district attorney's office in 1981</p> <p>6 while I was still in law school. And then when I</p> <p>7 graduated from law school, I was hired as a prosecutor.</p> <p>8 I served as a prosecutor until, I believe, it was 19 --</p> <p>9 around 1997. Then I became a judge, I believe, in 1999.</p> <p>10 I served five years -- no -- six years, I believe, as a</p> <p>11 judge in Harris County in a criminal -- 183rd Criminal</p> <p>12 District Court in Harris County.</p> <p>13 And then I ran for the senate in 2008.</p> <p>14 Was elected in December 2008, and have served as the</p> <p>15 senator representing the Senate District 17 since</p> <p>16 December of 2008 to the present.</p> <p>17 Q. Thank you.</p> <p>18 The -- have you had any contested races?</p> <p>19 A. Yes.</p> <p>20 Q. Would you describe most of your elections as</p> <p>21 contested or most of them uncontested?</p> <p>22 A. Most contested.</p> <p>23 Q. What were the -- did you have democratic and</p> <p>24 republican opponents when you were elected in</p> <p>25 December of 2008?</p>
<p style="text-align: right;">Page 12</p> <p>1 A. Yes.</p> <p>2 Q. Have you had a democratic opponent each cycle</p> <p>3 since then?</p> <p>4 A. I don't recall specifically.</p> <p>5 Q. Have you run an election contest and been</p> <p>6 unsuccessful?</p> <p>7 A. No.</p> <p>8 Q. Now, when you started your service in the</p> <p>9 legislature in 2008, I assume you were assigned some</p> <p>10 committees and you began your work as senator; is that</p> <p>11 right?</p> <p>12 A. Correct.</p> <p>13 Q. Can you give -- can you identify the committees</p> <p>14 that you've served on?</p> <p>15 A. The entire time?</p> <p>16 Q. Yeah. To the best you can. I know you...</p> <p>17 A. To the best I can. It won't be exact. I want</p> <p>18 to preface with that.</p> <p>19 But some of the first committees I served</p> <p>20 on was health and human services. I believe I served --</p> <p>21 did not serve on criminal justice my first term, I don't</p> <p>22 believe. Higher education at some point. These are no</p> <p>23 particular order. State affairs; I was the chair for</p> <p>24 several sessions. Jurisprudence administration. I've</p> <p>25 been the vice chair of criminal justice since, I</p>	<p style="text-align: right;">Page 13</p> <p>1 believe, my second session. Redistricting both in</p> <p>2 2000- -- I guess that was '11 and, of course, this time</p> <p>3 around. Those are some of them. Would not be totally</p> <p>4 inclusive.</p> <p>5 Q. On the redistricting committee, can you recall</p> <p>6 when you were first appointed to it?</p> <p>7 A. No.</p> <p>8 Q. Was it sometime in advance of 2011?</p> <p>9 A. I don't recall.</p> <p>10 Q. Have you served on the redistricting committee</p> <p>11 from 2011 until present?</p> <p>12 A. No.</p> <p>13 Q. When was it that you were off the committee?</p> <p>14 A. I don't recall, but the committee would have</p> <p>15 been disbanded at some point after the 2011 political</p> <p>16 process.</p> <p>17 Q. Did you serve on the committee when it met in</p> <p>18 2013?</p> <p>19 A. I don't recall.</p> <p>20 Q. Is there anything that you recall from the</p> <p>21 2011, 2013 redistricting process?</p> <p>22 MR. HILTON: I'm just gonna object there</p> <p>23 to the breadth of the question, but also to the extent</p> <p>24 that it is broad, could implicate some privileged</p> <p>25 matters, particularly legislative privilege, which</p>

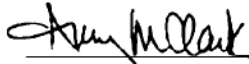
<p style="text-align: right;">Page 14</p> <p>1 Senator Huffman is going to be asserting today to the 2 full extent provided by law, including communications 3 where other legislators and their staffs, her staff as 4 well as her thoughts, opinions, mental processes, and 5 mental impressions. 6 So with -- with -- with that objection, 7 I'll instruct you, Senator, you can answer that 8 question, but don't reveal any legislative privileged 9 information. You can answer based on nonprivileged 10 information or give a nonprivileged answer. 11 A. Could you repeat the question. 12 Q. (By Mr. Dunn) Is there anything you remember 13 from the 2011 committee process that you can think of 14 here today that is not covered by this legislative 15 privilege? 16 A. No. 17 Q. Now, I understand your lawyer just said that. 18 But for the purposes of your record, I 19 just want to make sure it's clear: Are you invoking 20 legislative privilege today? 21 A. Yes. 22 Q. Okay. And are you invoking it to the fullest 23 extent possible? 24 A. Yes. 25 Q. Are you able to tell us why you're invoking</p>	<p style="text-align: right;">Page 15</p> <p>1 legislative privilege? 2 A. No. 3 MR. SWEETEN: Objection. 4 MR. HILTON: And, also, just object to the 5 extent that it indicates privilege, also attorney-client 6 privilege. 7 But you can answer. 8 MR. GABER: Interrupt really quick. I'm 9 gonna ask the folks on Zoom to all mute your lines. 10 Q. (By Mr. Dunn) Have you, to the best of your 11 knowledge, invoked the legislative privilege prior to 12 today in any testimony? 13 A. I don't recall. 14 Q. You're not able to list any today anyway prior 15 to -- to now? 16 A. I don't recall. 17 Q. Okay. Do you have an understanding -- and, 18 again, I'm not trying to get into your conversations 19 with your lawyers. 20 But do you have an understanding of whose 21 legislative privilege it is and whose right it is to 22 invoke it? 23 MR. HILTON: Again, object to the extent 24 that it could call for attorney-client information 25 privilege.</p>
<p style="text-align: right;">Page 16</p> <p>1 So don't reveal any conversations. 2 A. You're asking me -- repeat it. 3 Q. (By Mr. Dunn) Do you have an understanding of 4 who can invoke legislative privilege and who can choose 5 to waive it? 6 A. Yes. 7 Q. Okay. And -- and the reason I'm asking you 8 this -- I understand your lawyer's probably given you 9 some advice, and I'm not trying to get into that. But 10 you're a lawyer yourself. So I don't know the line 11 between what you know on your own and what your lawyers 12 have told you. 13 So if you tell me, you know, all I know is 14 what my lawyers have told me, then I'll move on to 15 something else. 16 But what is your understanding of 17 whether -- of whether you have an individual legislative 18 privilege or it's the body as a whole? 19 MR. HILTON: I'm gonna object to those 20 questions to the extent that it's getting into 21 privileged information, both legislative and 22 attorney-client. 23 There's no -- you know, Senator Huffman is 24 a lay witness; she's not an expert for this purpose. 25 There is no way to separate any sort of preexisting or</p>	<p style="text-align: right;">Page 17</p> <p>1 independent knowledge from the legal advice that she may 2 have obtained. 3 So I'm gonna -- on that basis, I'm gonna 4 instruct the witness not to answer. 5 MR. DUNN: So is it the case that we won't 6 be answering any more testimony today about legislative 7 privilege? 8 MR. HILTON: I don't know until you ask 9 your question. 10 MR. DUNN: All right. 11 Q. (By Mr. Dunn) On the -- so going back to your 12 service in 2011. I think you said -- and I just want to 13 make sure I have it right -- you don't recall whether 14 you served on the committee in 2013; is that true? 15 A. Correct. 16 Q. Okay. You do understand that there was 17 litigation in the last decade about redistricting in 18 Texas? 19 A. Yes. 20 Q. Do you understand that the U.S. Supreme Court 21 had at least two opportunities to rule on redistricting 22 in Texas? 23 A. I don't recall how many there were. 24 Q. Okay. Do you recall reading any of those 25 decisions at any point?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. No.</p> <p>2 Q. Do you recall whether you read any of the</p> <p>3 decisions of the San Antonio three-judge court?</p> <p>4 A. No.</p> <p>5 Q. Do you recall whether you read any of the</p> <p>6 decisions of the three-judge federal court in</p> <p>7 Washington, D.C.?</p> <p>8 A. No.</p> <p>9 Q. And just to make sure our record's clear.</p> <p>10 You don't recall or you didn't, you know</p> <p>11 you didn't?</p> <p>12 A. I don't recall.</p> <p>13 Q. Okay. Are there any authorities in the last 10</p> <p>14 years for redistricting for the Supreme Court that you</p> <p>15 do recall reviewing?</p> <p>16 MR. HILTON: Objection to the extent that</p> <p>17 it could call for attorney-client privileged information</p> <p>18 or legislative privileged information.</p> <p>19 You can answer to the extent that you can</p> <p>20 without revealing any privileged information.</p> <p>21 A. Repeat the question, please.</p> <p>22 Q. (By Mr. Dunn) Are there any U.S. Supreme Court</p> <p>23 decisions on redistricting in the last decade that you</p> <p>24 do remember having reviewed?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. Okay. And you were the chair of the</p> <p>2 redistricting committee here in this most recent cycle</p> <p>3 in Texas; is that true?</p> <p>4 A. Yes.</p> <p>5 Q. When was it that you were appointed to the</p> <p>6 committee this -- this go around?</p> <p>7 A. I don't recall the exact date.</p> <p>8 Q. Do you recall a year?</p> <p>9 A. No.</p> <p>10 Q. Okay. Who was it that would have appointed you</p> <p>11 to the committee?</p> <p>12 A. Lieutenant Governor Dan Patrick.</p> <p>13 Q. Did he have any discussions with you at the</p> <p>14 time of your appointment?</p> <p>15 MR. HILTON: I'm gonna object to that</p> <p>16 question to the extent that calls for legislative</p> <p>17 privileged information and instruct the witness not to</p> <p>18 answer to the extent that it would reveal any</p> <p>19 legislative privileged information.</p> <p>20 Q. (By Mr. Dunn) Have you had any conversations at</p> <p>21 any point with the lieutenant governor about your</p> <p>22 service on the redistricting committee?</p> <p>23 MR. HILTON: I'm gonna object to the</p> <p>24 extent that it could call for legislative privileged</p> <p>25 information. The fact of a conversation may not be</p>
<p style="text-align: right;">Page 20</p> <p>1 privileged, but certainly the content would be, and the</p> <p>2 question calls for inquiry into the content of</p> <p>3 privileged conversations.</p> <p>4 Q. (By Mr. Dunn) The -- at some point in time,</p> <p>5 the -- you geared up to do redistricting and you engaged</p> <p>6 some lawyers; is that true?</p> <p>7 A. Correct. Yes.</p> <p>8 Q. Do you recall who it is that you obtained legal</p> <p>9 services from in the redistricting chair capacity?</p> <p>10 A. I don't remember their names, their law firm</p> <p>11 name.</p> <p>12 Q. Do you --</p> <p>13 A. I know it was Scott and Todd, if that helps.</p> <p>14 Q. Okay. All right. That Scott and Todd were</p> <p>15 first names of the lawyers or...</p> <p>16 A. Yes.</p> <p>17 Q. Yeah. Okay.</p> <p>18 Did you have any lawyers on staff?</p> <p>19 A. Yes.</p> <p>20 Q. Who were they?</p> <p>21 A. Anne Mackin and Sean Opperman.</p> <p>22 Q. Any other lawyers you can recall that you</p> <p>23 conferred with?</p> <p>24 A. Other than the attorney general, no.</p> <p>25 Q. Oh.</p>	<p style="text-align: right;">Page 21</p> <p>1 A. Attending general staff, I should say, not the</p> <p>2 attorney general.</p> <p>3 Q. Were you the person that -- I'm gonna focus on</p> <p>4 Sean Opperman and Anne Mackin for a moment.</p> <p>5 Were you the person that -- that, you</p> <p>6 know, sort of interviewed and hired those positions?</p> <p>7 A. Yes.</p> <p>8 Q. Did you interview other candidates, other than</p> <p>9 the two of them?</p> <p>10 A. I don't recall.</p> <p>11 Q. Do you recall who suggested them to you?</p> <p>12 A. No.</p> <p>13 Q. Do you recall what their qualifications were</p> <p>14 for the position?</p> <p>15 A. No.</p> <p>16 Q. Do you have any awareness of Ms. Mackin's</p> <p>17 participation in redistricting in Texas prior to being</p> <p>18 hired by your office?</p> <p>19 A. Yes.</p> <p>20 Q. What was that?</p> <p>21 MR. HILTON: You can answer, just don't go</p> <p>22 too far and reveal any legislative privilege or</p> <p>23 attorney-client information. I think you can answer</p> <p>24 without revealing privileged information. But...</p> <p>25 A. I knew she had participated in the last</p>

<p style="text-align: right;">Page 22</p> <p>1 redistricting cycle as an employee -- excuse me -- at 2 the attorney general's office. 3 Q. (By Mr. Dunn) Did you -- did you have any more 4 detailed understanding of her participation, other than 5 that she participated? 6 MR. HILTON: Same objection. 7 You can answer to the extent that you can 8 answer without revealing privileged information. 9 A. No. I knew she was on the team. 10 Q. (By Mr. Dunn) Do you know how you became aware 11 of her as a -- as an applicant for this position? 12 MR. HILTON: Same objection. 13 You can answer to the extent you can 14 answer without revealing privileged information. 15 A. I don't recall. 16 Q. (By Mr. Dunn) And then the -- on Mr. Opperman, 17 how is it that you became aware of his application for 18 the position or of him? 19 A. Mr. Opperman has been my general counsel and 20 worked for me for -- for several years. 21 Q. Does he still work for you today? 22 A. Yes. 23 Q. Does Ms. Mackin still work with you today? 24 A. No. 25 Q. When did she leave your employment?</p>	<p style="text-align: right;">Page 23</p> <p>1 A. I believe her last date was -- geez, I don't 2 recall specifically. 3 Q. Has it been recently? 4 A. It's been fairly recently. I just don't 5 remember the exact date. 6 Q. Do you remember if you've read or reviewed any 7 of Ms. Mackin's writing as counsel in 8 redistricting-related matters? 9 MR. HILTON: Object to the extent that 10 that calls for legislative privileged information and 11 attorney-client information. I'm gonna instruct her not 12 to answer to the extent it would reveal any privileged 13 information. 14 Q. (By Mr. Dunn) So are you able to answer the 15 question without... 16 A. Could you... 17 Q. Sure. 18 A. Have I read anything that Anne Mackin has ever 19 wrote? 20 Q. In -- in redistricting-related litigation. 21 A. I don't -- I'm not gonna answer that because -- 22 just invoke my privilege. 23 Q. Okay. And you made some statements on the 24 floor of the senate when you were laying out the bill 25 for the -- for the senate district map.</p>
<p style="text-align: right;">Page 24</p> <p>1 A. For the map? 2 Q. Yes. 3 A. Yes. Okay. 4 Q. Are -- is it your position that, other than 5 what you said on the senate floor, everything else that 6 you know about the senate map is legislative privilege? 7 MR. HILTON: I'm gonna object to the 8 breadth of the question. There's -- there's no way to 9 answer that question without knowing what you're asking 10 for. Also, I'm gonna object to the extent that it calls 11 for legislative privileged information and calls for the 12 witness to make a legal conclusion about what may or may 13 not be privileged information. 14 Q. (By Mr. Dunn) Okay. Well, there was some 15 discussion in both the committee and on the senate floor 16 about what the U.S. Supreme Court ruled on House 17 District 90 in Tarrant County. 18 Do you remember any -- any of that 19 discussion? 20 A. I don't recall. 21 Q. Do you recall what the U.S. Supreme Court ruled 22 with respect to House District 90? 23 A. No. 24 Q. Do you know whether you considered that in the 25 way you crafted the senate plan in Tarrant County?</p>	<p style="text-align: right;">Page 25</p> <p>1 MR. HILTON: I'm gonna object and instruct 2 the witness not to answer. That calls for legislative 3 privileged information. 4 Q. (By Mr. Dunn) Were there any questions that you 5 can recall having answered publicly about House District 6 90 and the Supreme Court's ruling on it? 7 A. Anything I said -- I don't recall. 8 Q. At some point in time, you stated publicly what 9 your motivations were in crafting the senate plan. 10 You recall what those were? 11 MR. HILTON: I'm gonna object to the 12 question to the extent that it characterizes 13 conversations that may or may not have happened. It's 14 vague, needs to be more specific. 15 If you have something you'd like to show 16 the witness, a transcript, certainly you can do that. 17 But that -- that -- that question is 18 extremely broad and is -- 19 You know, I'm gonna instruct you not to 20 answer to the extent that you can't do so without 21 revealing legislative privileged information. 22 Q. (By Mr. Dunn) Do you recall saying anything 23 publicly about your motivations for the senate district 24 plan? 25 MR. HILTON: Again, I'm gonna object to</p>

<p style="text-align: right;">Page 26</p> <p>1 the extent that it could call for legislative 2 privileged information. 3 If you can limit your answer only to 4 public statements and if you understand the question, 5 you can answer. 6 A. Without waiving my legislative privilege, yes, 7 I believe I made public statements -- 8 Q. (By Mr. Dunn) Okay. Can you -- 9 A. -- on the floor of senate. 10 Q. Can you recall any of those? 11 A. I believe I could. 12 These, of course, without waiving my 13 privilege, are statements that I've made publicly on the 14 floor of the senate that are part of the public record. 15 I believe I talked about making sure that 16 the maps were legally compliant, the need to equalize 17 population. We talked about preserving, to the extent 18 possible, political subdivisions, communities of 19 interest. To the extent possible, preserving the core 20 district -- the core of the district, of the existing 21 district. Talked about accommodating members of parties 22 where possible. Talked about assuring incumbent 23 protection where possible. Talked about geographic 24 compactness, and talked about the partisan issues 25 involved in redistricting.</p>	<p style="text-align: right;">Page 27</p> <p>1 I think that's a summation. I may have 2 left something out. That's the best of my recollection 3 at this point that I said publicly. 4 Q. Would you describe the senate map as a partisan 5 gerrymander? 6 MR. HILTON: Objection. Calls for the 7 witness to reveal legislative privileged information 8 about her opinions and mental processes regarding 9 legislation. I'm gonna instruct the witness not to 10 answer. 11 Yeah. To the extent you can answer based 12 on public statements or any nonprivileged information, 13 you can. 14 A. I do believe -- again, without giving up my 15 privilege. I do believe that there were statements made 16 that the -- the partisan considerations were taken into 17 consideration. You know, the -- so, yes. 18 Q. (By Mr. Dunn) With respect to the -- the 19 specific lines in Senate District 10, were they partisan 20 motivated? 21 A. Yes. 22 Q. Is that a statement that you made publicly? 23 A. Yes. And, again, I'm not giving up my 24 privilege, but I do believe I said that publicly. 25 MR. GABER: Patrick, if you could avoid</p>
<p style="text-align: right;">Page 28</p> <p>1 nodding yes and no to the witness. 2 MR. SWEETEN: Okay. If you can avoid 3 instructing me, whether I'm nodding or not. And -- and, 4 you know, it's not really your place to instruct me not 5 to do that. I haven't -- and if you're -- if you're 6 making some allegation, go ahead and make it. 7 MR. GABER: No. I'm just asking you -- 8 MR. SWEETEN: I'm allowed to nod, if I'd 9 like to do that. If you're -- if you're insinuating 10 that I'm -- I'm, you know, telling the witness how to 11 answer it, then make the allegation. 12 MR. GABER: No. I'm just asking you -- 13 MR. SWEETEN: I'm not. Okay? 14 MR. GABER: I'm asking you not to nod, 15 even if you're just answering it to yourself. 16 THE WITNESS: Sir, excuse me. I'm 17 perfectly capable of answering these questions and not 18 taking my lawyer's answers. Thank you. 19 MR. HILTON: I'm just going to state for 20 the record, Senator Huffman's is providing her own 21 answers here today. She's not taking any instruction or 22 following any queues from her counsel. Her answers are 23 under oath, and they are her own. 24 And, Senator Huffman, I'm also going to 25 ask you if you can just wait a beat between Mr. Dunn's</p>	<p style="text-align: right;">Page 29</p> <p>1 question and your response so that we can think about 2 the question and object, if needed. 3 THE WITNESS: Certainly. 4 MR. DUNN: I'm gonna take a break at this 5 moment. 6 (Recess from 9:28 a.m. to 9:42 a.m.) 7 Q. (By Mr. Dunn) We're back from the break, 8 Senator. 9 It sounds like we have some disagreements 10 amongst the lawyers about some legal issues. So I just 11 want to ask you a couple of questions. I think we can 12 wrap up, and then we'll put some matters to the Court. 13 A. Okay. 14 Q. I just want to be clear. 15 Have I been courteous to you today? 16 A. Yes. 17 Q. Now, on the -- on the -- you know, I understand 18 you're gonna object to this. I just want to ask a 19 couple of questions, and then we'll -- you know, we'll 20 have, I think, what we need to let the Court decide the 21 legal issues. 22 But is there anything you can tell me 23 about the motivation behind the Senate District 10 part 24 of the senate plan that you haven't said publicly today 25 without invoking privilege?</p>

<p style="text-align: right;">Page 30</p> <p>1 MR. HILTON: I'm gonna object to the</p> <p>2 extent it's overbroad and vague as to what it's calling</p> <p>3 for, but also to the extent it calls for legislative</p> <p>4 privileged information.</p> <p>5 To the extent you can answer without</p> <p>6 revealing privileged information by referring to your</p> <p>7 public statements.</p> <p>8 A. Could you repeat.</p> <p>9 THE WITNESS: I'm sorry. Spoke over you.</p> <p>10 A. Could you repeat the question, please.</p> <p>11 Q. (By Mr. Dunn) Sure. Is there anything about</p> <p>12 the particular motivation behind the Senate District 10</p> <p>13 part of the senate plan that you can testify about today</p> <p>14 that hasn't already been said -- said publicly without</p> <p>15 invoking the legislative privilege?</p> <p>16 A. No, sir.</p> <p>17 MR. HILTON: Same objection.</p> <p>18 Q. (By Mr. Dunn) And is there anything about the</p> <p>19 particular lines, you know, and the location of the</p> <p>20 lines for Senate District 10 that you can tell us about</p> <p>21 today without invoking legislative privilege that hasn't</p> <p>22 already been said publicly?</p> <p>23 MR. HILTON: Same objection. Calls for</p> <p>24 legislative privileged information.</p> <p>25 If you can answer without revealing</p>	<p style="text-align: right;">Page 31</p> <p>1 privileged information.</p> <p>2 A. No.</p> <p>3 Q. (By Mr. Dunn) Okay. Now, I think -- just gonna</p> <p>4 say something to your lawyer, and I think we're gonna</p> <p>5 wrap up.</p> <p>6 MR. DUNN: I think we've got a</p> <p>7 disagreement about the scope of privilege and when it</p> <p>8 can be invoked here. I don't think it's worth y'all's</p> <p>9 time or mine, and certainly not the senator's, to go</p> <p>10 through a bunch of questions, have privilege invoked,</p> <p>11 not have answers.</p> <p>12 So I'm gonna suggest that you reserve your</p> <p>13 rights on the question; we reserve our rights on the</p> <p>14 question. We'll continue this deposition. We'll put</p> <p>15 the matters to the Court.</p> <p>16 We understand in all likelihood and almost</p> <p>17 certainly that means if there is a reconvened</p> <p>18 deposition, it will be after the preliminary injunction</p> <p>19 hearing. But we'll take the matter up with the Court.</p> <p>20 Okay?</p> <p>21 Any dispute?</p> <p>22 MR. SWEETEN: And to be clear, I just want</p> <p>23 to -- Chad, I think what you're saying is you believe</p> <p>24 that there's a -- that the assertion of legislative</p> <p>25 privilege in this case that's been made thus far, you</p>
<p style="text-align: right;">Page 32</p> <p>1 believe it to have been what? You don't believe</p> <p>2 legislative privilege applies, or do you believe it's --</p> <p>3 it's -- the contours of it have not been accurately</p> <p>4 indicated?</p> <p>5 MR. DUNN: Both.</p> <p>6 MR. SWEETEN: Okay. So -- so it is the</p> <p>7 position of the Plaintiffs in this case there is no</p> <p>8 legislative privilege?</p> <p>9 MR. DUNN: No. I'm not saying that's the</p> <p>10 position. I think we have a disagreement about what</p> <p>11 legislative privilege can be invoked, under what</p> <p>12 circumstances, and what kind of case claims and</p> <p>13 defenses.</p> <p>14 MR. SWEETEN: Okay.</p> <p>15 MR. HILTON: Well, yeah, it -- I think</p> <p>16 it's fine to reserve further questioning. And if you</p> <p>17 don't wish to proceed, that's -- that's fine. I think</p> <p>18 it's gonna be our position that, you know, it's not</p> <p>19 necessarily the case that reopening this deposition will</p> <p>20 be proper.</p> <p>21 I think all of our objections are well</p> <p>22 within the contours of the legislative privilege and</p> <p>23 they have been proper. And to the extent I've</p> <p>24 instructed the witness not to answer, it's only to the</p> <p>25 extent that doing so would reveal privileged</p>	<p style="text-align: right;">Page 33</p> <p>1 information.</p> <p>2 You're free to question her on</p> <p>3 nonprivileged issues. And our position would be that</p> <p>4 now is your opportunity. And even if we do have some</p> <p>5 sort of motions for access in front of the Court and</p> <p>6 we -- we have to come back here about the scope of</p> <p>7 privilege, this is your opportunity to ask about</p> <p>8 nonprivileged matters, to the extent you haven't already</p> <p>9 done so.</p> <p>10 I'll also add that, you know, I -- I've</p> <p>11 been summarizing my objections here and, believe it or</p> <p>12 not, trying to limit the length of my speaking</p> <p>13 objections. We're gonna reserve the right to fully</p> <p>14 brief this for the Court and explain in detail the</p> <p>15 contours of the legislative privilege.</p> <p>16 But, again, our position is that all of</p> <p>17 the objections have been proper and now is your</p> <p>18 opportunity to question the witness, if you want to.</p> <p>19 MR. DUNN: Sounds like we all got a speech</p> <p>20 out this morning, so I'll move to adjourn.</p> <p>21 (Proceedings concluded at 9:46 a.m.)</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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<p>1 STATE OF TEXAS</p> <p>2 COUNTY OF TRAVIS</p> <p>3</p> <p>4 REPORTER'S CERTIFICATE</p> <p>5 ORAL DEPOSITION OF SENATOR JOAN HUFFMAN</p> <p>6 January 21, 2022</p> <p>7</p> <p>8 I, the undersigned Certified Shorthand Reporter in</p> <p>9 and for the State of Texas, certify that the facts</p> <p>10 stated in the foregoing pages are true and correct.</p> <p>11 I certify that in accordance with Rule 30(e)(1),</p> <p>12 signature was waived.</p> <p>13 I further certify that I am neither attorney or</p> <p>14 counsel for, related to, nor employed by any parties to</p> <p>15 the action in which this testimony is taken and,</p> <p>16 further, that I am not a relative or employee of any</p> <p>17 counsel employed by the parties hereto or financially</p> <p>18 interested in the action.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 SUBSCRIBED AND SWORN TO under my hand and seal of</p> <p>2 office on this the 23rd day of January, 2022.</p> <p>3</p> <p>4 </p> <p>5 Amy M. Clark, CSR</p> <p>6 Texas CSR 8753</p> <p>7 Expiration: 10/31/2023</p> <p>8 Ken Owen & Associates, LP</p> <p>9 Firm No. 115</p> <p>10 801 West Avenue</p> <p>11 Austin, Texas 78701</p> <p>12 (512)472-0882</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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